

EXHIBIT B

USDC SDNY
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DOCUMENT

ELECTRONICALLY FILED

DOC#

DATE

LED: 2/22/12

MONIQUE DA SILVA MOORE, :
 MARYELLEN O'DONOHUE, LAURIE :
 MAYERS, HEATHER PIERCE, and :
 KATHERINE WILKINSON, on behalf of :
 themselves and all others similarly :
 situated, :

Plaintiffs,

vs.

PUBLICIS GROUPE SA and
 MSLGROUP,

Defendants.

Case No. 11-cv-1279 (ALC) (AJP)

PARTIES' PROPOSED PROTOCOL
RELATING TO THE PRODUCTION OF
ELECTRONICALLY STORED
INFORMATION ("ESI")

C. ORR

A. Scope

1. General. The procedures and protocols outlined herein govern the production of electronically stored information ("ESI") by MSLGROUP Americas, Inc. ("MSL") during the pendency of this litigation. The parties to this protocol will take reasonable steps to comply with this agreed-upon protocol for the production of documents and information existing in electronic format. Nothing in this protocol will be interpreted to require disclosure of documents or information protected from disclosure by the attorney-client privilege, work-product product doctrine or any other applicable privilege or immunity. It is Plaintiffs' position that nothing in this protocol will be interpreted to waive Plaintiffs' right to object to this protocol as portions of it were mandated by the Court over Plaintiffs' objections, including Plaintiffs' objections to the predictive coding methodology proposed by MSL.

2. Limitations and No-Waiver. This protocol provides a general framework for the production of ESI on a going forward basis. The Parties and their attorneys do not intend by this protocol to waive their rights to the attorney work-product privilege, except as specifically required herein, and any such waiver shall be strictly and narrowly construed and shall not

extend to other matters or information not specifically described herein. All Parties preserve their attorney client privileges and other privileges and there is no intent by the protocol, or the production of documents pursuant to the protocol, to in any way waive or weaken these privileges. All documents produced hereunder are fully protected and covered by the Parties' confidentiality and clawback agreements and orders of the Court effectuating same.

3. Relevant Time Period. January 1, 2008 through February 24, 2011 for all non-email ESI relating to topics besides pay discrimination and for all e-mails. January 1, 2005 through February 24, 2011 for all non-e-mail ESI relating to pay discrimination for New York Plaintiffs.

B. ESI Preservation

1. MSL has issued litigation notices to designated employees on February 10, 2010, March 14, 2011 and June 9, 2011.

C. Sources

1. The Parties have identified the following sources of potentially discoverable ESI at MSL. Phase I sources will be addressed first, and Phase II sources will be addressed after Phase I source searches are complete. Sources marked as "N/A" will not be searched by the Parties.

	Data Source	Description	Phase
a	EMC SourceOne Archive	Archiving System used to capture and store all incoming and outbound e-mails and selected instant message conversations saved through IBM Sametime (see below).	I
b	Lotus Notes E-mail	Active corporate system that provides e-mail communication and calendaring functions.	N/A
c	GroupWise E-mail	Legacy corporate system that provided e-mail communication and calendaring functions.	N/A
d	IBM Sametime	Lotus Notes Instant Messaging and collaboration application.	N/A
e	Home Directories	Personal network storage locations on the file server(s)	II

		dedicated to individual users. (With the exception of 2 home directories for which MSL will collect and analyze the data to determine the level of duplication as compared to the EMC SourceOne Archive. The parties will meet and confer regarding the selection of the two custodians.)	
f	Shared Folders	Shared network storage locations on the file server(s) that are accessible by individual users, groups of users or entire departments. (With the exception of the following Human Resources shared folders which will be in Phase I: Corporate HR, North America HR and New York HR.)	II
g	Database Servers	Backend databases (e.g. Oracle, SQL, MySQL) used to store information for front end applications or other purposes.	N/A
h	Halogen Software	Performance management program provided by Halogen to conduct performance evaluations.	I
i	Noovoo	Corporate Intranet site.	II
j	Corporate Feedback	E-mail addresses that employees may utilize to provide the company with comments, suggestions and overall feedback.	I
k	Hyperion Financial Management ("HFM")	Oracle application that offers global financial consolidation, reporting and analysis.	N/A
l	Vurv/Taleo	Talent recruitment software.	II
m	ServiceNow	Help Desk application used to track employee computer related requests.	N/A
n	PeopleSoft	Human resources information management system.	I
o	PRISM	PeopleSoft component used for time and billing management.	I
p	Portal	A project based portal provided through Oracle/BEA Systems.	II
q	Desktops/Laptops	Fixed and portable computers provided to employees to perform work related activities. (With the exception of 2 desktop/laptop hard drives for which MSL will collect and analyze the data to determine the level of duplication as compared to the EMC SourceOne Archive. The parties will meet and confer regarding the selection of the two custodians.)	II
r	Publicis Benefits Connection	Web based site that maintains information about employee benefits and related information.	II
s	GEARS	Employee expense reporting system.	II
t	MS&L City	Former corporate Intranet.	N/A
u	Adium	Application which aggregates instant messages.	N/A
v	Pidgin	Application which aggregates instant message.	N/A
w	IBM Lotus	Mobile device synchronization and security system.	N/A

	Traveler and MobileIron		
y	Mobile Communication Devices	Portable PDAs, smart phones, tablets used for communication.	N/A
z	Yammer	Social media and collaboration portal.	N/A
aa	SalesForce.com	Web-based customer relationship management application.	N/A
bb	Removable Storage Devices	Portable storage media, external hard drives, thumb drives, etc. used to store copies of work related ESI.	N/A

a. EMC SourceOne - MSL uses SourceOne, an EMC e-mail archiving system that captures and stores all e-mail messages that pass through the corporate e-mail system. In addition, if a user chooses to save an instant messaging chat conversation from IBM Sametime (referenced below), that too would be archived in SourceOne. Defendant MSL also acknowledges that calendar items are regularly ingested into the SourceOne system. The parties have agreed that this data source will be handled as outlined in section E below.

b. Lotus Notes E-mail - MSL currently maintains multiple Lotus Notes Domino servers in various data centers around the world. All e-mail communication and calendar items are journaled in real time to the EMC SourceOne archive. The parties have agreed to not collect any information from this data source at this time.

c. GroupWise E-mail - Prior to the implementation of the Lotus Notes environment, GroupWise was used for all e-mail and calendar functionality. Before the decommissioning of the GroupWise servers, MSL created backup tapes of all servers that housed the GroupWise e-mail databases. The parties have agreed to not collect any information from this data source at this time.

d. IBM Sametime - MSL provides custodians with the ability to have real time chat conversations via the IBM Sametime application that is part of the Lotus Notes suite of products.

e. Home Directories – Custodians with corporate network access at MSL also have a dedicated and secured network storage location where they are able to save files. MSL will collect the home directory data for 2 custodians and analyze the data to determine the level of duplication of documents in this data source against the data contained in the EMC SourceOne archive for the same custodians. (The parties will meet and confer regarding the selection of the two custodians.) The results of the analysis will be provided to Plaintiffs so that a determination can be made by the parties as to whether MSL will include this data source in its production of ESI to Plaintiffs. If so, the parties will attempt to reach an agreement as to the approach used to collect, review and produce responsive and non-privileged documents.

f. Shared Folders – Individual employees, groups of employees and entire departments at MSL are given access to shared network storage locations to save and share files. As it relates to the Human Resources related shared folders (i.e., North America HR Drive (10.2 GB), Corporate HR Drive (440 MB), NY HR Drive (1.9 GB), Chicago HR Drive (1.16 GB), Boston HR Drive (43.3 MB), and Atlanta HR Drive (6.64 GB)), MSL will judgmentally review and produce responsive and non-privileged documents from the North America HR Drive, Corporate HR Drive, and NY HR Drive. MSL will produce to Plaintiffs general information regarding the content of other Shared Folders. The parties will meet and confer regarding the information gathered concerning the other Shared Folders and discuss whether any additional Shared Folders should be moved to Phase I.

g. Database Servers –MSL has indicated that it does not utilize any database servers, other than those that pertain to the sources outlined above in C, which are likely to contain information relevant to Plaintiffs' claims.

h. Halogen Software – MSL utilizes a third party product, Halogen, for performance management and employee evaluations. The parties will meet and confer in order to

exchange additional information and attempt to reach an agreement as to the scope of data and the approach used to collect, review and produce responsive and non-privileged documents.

i. Noovoo – MSL maintains a corporate Intranet site called “Noovoo” where employees are able to access Company-related information. MSL will provide Plaintiffs with any employment-related policies maintained within Noovoo.

j. Corporate Feedback – MSL has maintained various e-mail addresses that employees may utilize to provide the company with comments, suggestions and overall feedback. These e-mail addresses include “powerofone@mslworldwide.com”, “poweroftheindividual@mslworldwide.com”, “townhall@mslworldwide.com” and “whatsonyourmind@mslworldwide.com”. The parties have agreed that all responsive and non-privileged ESI will be produced from these e-mail accounts and any other e-mail accounts that fall under this category of information. At present, MSL intends to manually review the contents of each of these e-mail accounts. However, if after collecting the contents of each of the e-mail accounts MSL determines that a manual review would be impractical, the parties will meet and confer as to the approach used to collect, review and produce responsive and non-privileged documents.

k. Hyperion Financial Management (“HFM”) – MSL uses an Oracle application called HFM that offers global financial consolidation, reporting and analysis capabilities.

l. Vurv/Taleo – Since approximately 2006, MSL used an application known as Vurv as its talent recruitment software. As of August 31, 2011, as a result of Vurv being purchased by Taleo, MSL has been using a similar application by Taleo as its talent recruitment software. The application, which is accessed through MSL's public website, allows users to search for open positions as well as input information about themselves. To the extent Plaintiffs

contend they were denied any specific positions, they will identify same and the Parties will meet and confer to discuss what, if any, information exists within Vurv/Taleo regarding the identified position. If information exists in Vurv/Taleo or another source regarding these positions, MSL will produce this information, to the extent such information is discoverable.

m. ServiceNow – MSL utilizes ServiceNow as its Help Desk application. This system covers a wide variety of requests by employees for computer-related assistance (e.g., troubleshoot incidents, install software, etc.).

n. PeopleSoft – MSL utilizes PeopleSoft, an Oracle-based software product, to record employee data such as date of hire, date of termination, promotions, salary increases, transfers, etc. MSL has produced data from this source and will consider producing additional data in response to a specific inquiry from Plaintiffs.

o. PRISM – MSL utilizes PRISM for tracking time and billing. It is used primarily to track an employee's billable time. MSL will consider producing additional data in response to a specific inquiry from Plaintiffs.

p. Portal – MSL maintains a portal provided through Oracle/BEA Systems. The portal is web-based and is used for light workflow activities (such as reviewing draft documents).

q. Desktops/Laptops – MSL provided employees with desktop and/or laptop computers to assist in work related activities. MSL will collect the desktop/laptop hard drive data for 2 custodians and analyze the data to determine the level of duplication of documents in this data source against the data contained in the EMC SourceOne archive for the same custodians. (The parties will meet and confer regarding the selection of the two custodians.) The results of the analysis will be provided to Plaintiffs so that a determination can be made by the parties as to whether MSL will include this data source in its production of ESI to Plaintiffs.

If so, the Parties will attempt to reach an agreement as to the approach used to collect, review and produce responsive and non-privileged documents.

r. Publicis Benefits Connection – Plaintiffs understand that MSL provides employees with access to a centralized web based site that provides access to corporate benefits information and other related content.

s. GEARS – MSL maintains a centralized web-based expense tracking and reporting system called “GEARS” where users are able to enter expenses and generate reports.

t. MS&L City – MSL maintained a corporate web-based Intranet prior to migrating to Noovoo.

u. Adium – This is a free and open source instant messaging client for Mac OS X users.

v. Pidgin – Pidgin is a chat program which lets users log into accounts on multiple chat networks simultaneously. However, the data resides with a third party messaging provider (e.g. AIM, Yahoo!, Google Talk, MSN Messenger, etc.).

w. IBM Lotus Traveler and MobileIron – MSL maintains these systems for e-mail device sync and security features for employees’ mobile devices, including Blackberry devices, iPhones, iPads, Android phones, and Android tablets.

x. Mobile Communication Devices - MSL provides mobile devices and/or connectivity including Blackberry devices, iPhones, iPads, Android phones, and Android tablets to designated employees.

y. Yammer – This is an instant messaging application hosted externally, used for approximately one year in or around 2008 through 2009.

z. SalesForce.com – This is a web-based customer relationship management application but it was not widely used.

aa. Removable Storage Devices – MSL does not restrict authorized employees from using removable storage devices.

D. Custodians

1. The Parties agree that MSL will search the e-mail accounts of the following individuals as they exist on MSL's EMC SourceOne archive. (Except where a date range is noted, the custodian's entire e-mail account was collected from the archive.)

	Custodian Name	Title
1.	Lund, Wendy	Executive VP of Global Client and Business Development
2.	Fite, Vicki	Managing Director, MSL Los Angeles
3.	Wilson, Renee	President, NE Region, Managing Director NY
4.	Brennan, Nancy (1/1/08 to 5/31/08)	SVP/Director Corporate Branding
5.	Lilien (Lillian , Kashanian), Tara	SVP, North America Human Resources
6.	Miller, Peter	Executive Vice President, CFO
7.	Masini, Rita	Chief Talent Officer
8.	Tsokanos, Jim	President of the Americas
9.	Da Silva Moore, Monique	Director Healthcare Practice, Global
10.	O'Kane, Jeanine (2/8/10 to 2/24/11)	Director of Healthcare North America
11.	Perlman, Carol	Senior VP
12.	Mayers, Laurie	SVP MS&L Digital
13.	Wilkinson, Kate	Account Executive
14.	Curran, Joel (5/1/08 to 5/31/10)	Managing Director MSL Chicago
15.	Shapiro, Maury	North American CFO
16.	Baskin, Rob (1/1/08 to 12/31/08)	Managing Director
17.	Pierce, Heather	VP
18.	Branam, Jud (1/1/08 to 1/31/10)	Managing Director, MS&L Digital
19.	McDonough, Jenni (1/1/08 to 12/31/08)	VP, Director of Human Resources
20.	Hannaford, Donald (1/1/08 to 3/1/08)	Managing Director
21.	Orr, Bill (1/1/08 to 2/24/11)	Managing Director
22.	Dhillon, Neil (9/8/08 to 5/31/10)	Managing Director MSL Washington DC
23.	Hubbard, Zaneta	Account Supervisor
24.	Morgan, Valerie (1/1/08 to 2/24/11)	HR Director
25.	Daversa, Kristin (1/1/08 to 2/24/11)	HR Director
26.	Vosk, Lindsey (1/1/08 to 2/24/11)	HR Manager
27.	Carberry, Joe (1/1/08 to 2/24/11)	President, Western Region
28.	Sheffield, Julie (1/1/08 to 2/24/11)	HR/Recruiting Associate
29.	MaryEllen O'Donohue	SVP (2010)

30.	Hass, Mark	CEO (former)
31.	Morsman, Michael	Managing Director, Ann Arbor (former)

E. Search Methodology¹

1. General. The Parties have discussed the methodologies or protocols for the search and review of ESI collected from the EMC SourceOne archive and the following is a summary of the Parties' agreement on the use of Predictive Coding. This section relates solely to the EMC SourceOne data source (hereinafter referred to as the "e-mail collection").

2. General Overview of Predictive Coding Process. MSL will utilize the Axcelerate software by Recommind to search and review the e-mail collection for production in this case.

The process begins with Jackson Lewis attorneys developing an understanding of the entire e-mail collection while identifying a small number of documents, the initial seed set, that is representative of the categories to be reviewed and coded (relevance, privilege, issue-relation). It is the step when the first seed sets are generated which is done by use of search and analytical tools, including keyword, Boolean and concept search, concept grouping, and, as needed, up to 40 other automatically populated filters available within the Axcelerate system. This assists in the attorneys' identification of probative documents for each category to be reviewed and coded.

Plaintiffs' counsel will be provided with preliminary results of MSL's hit counts using keyword searches to create a high priority relevant seed set, and will be invited to contribute their own proposed keywords. Thereafter, Plaintiffs' counsel will be provided with the non-privileged keyword hits – both from MSL's keyword list and Plaintiffs' keyword list – which were reviewed and coded by MSL. Plaintiffs' counsel will review the documents produced and promptly provide defense counsel with their own evaluation of the initial coding applied to the documents, including identification of any documents it believes were incorrectly coded. To the

¹ As noted in Paragraphs A(1) and J of this Protocol, Plaintiffs object to the predictive coding methodology proposed by MSL.

extent the parties disagree regarding the coding of a particular document, they will meet and confer in an effort to resolve the dispute prior to contacting the Court for resolution. The irrelevant documents so produced shall be promptly returned after review and analysis by Plaintiffs' counsel and/or resolution of any disputes by the Court.

The seed sets are then used to begin the Predictive Coding process. Each seed set of documents is applied to its relevant category and starts the software "training" process. The software uses each seed set to identify and prioritize all substantively similar documents over the complete corpus of the e-mail collection. The attorneys then review and code a judgmental sample of at least 500 of the "computer suggested" documents to ensure their proper categorization and to further calibrate the system by recoding documents into their proper categories. Axcelerate learns from the new corrected coding and the Predictive Coding process is repeated.

Attorneys representing MSL will have access to the entire e-mail collection to be searched and will lead the computer training, but they will obtain input from Plaintiffs' counsel during the iterative seed selection and quality control processes and will share the information used to craft the search protocol as further described herein. All non-privileged documents reviewed by MSL during each round of the iterative process (i.e., both documents coded as relevant and irrelevant) will be produced to Plaintiffs' counsel during the iterative seed set selection process. Plaintiffs' counsel will review the documents produced and promptly provide defense counsel with its own evaluation of the initial coding applied to the documents, including identification of any documents it believes were incorrectly coded. To the extent the Parties disagree regarding the coding of a particular document, they will meet and confer in an effort to resolve the dispute prior to contacting the Court for resolution. Again, the irrelevant documents

so produced shall be promptly returned after review and analysis by Plaintiffs' counsel and/or resolution of any disputes by the Court.

At the conclusion of the iterative review process, all document predicted by Axcelerate to be relevant will be manually reviewed for production. However, depending on the number of documents returned, the relevancy rating of those documents, and the costs incurred during the development of the seed set and iterative reviews, MSL reserves the right to seek appropriate relief from the Court prior to commencing the final manual review.

The accuracy of the search processes, both the systems' functions and the attorney judgments to train the computer, will be tested and quality controlled by both judgmental and statistical sampling. In statistical sampling, a small set of documents is randomly selected from the total corpus of the documents to be tested. The small set is then reviewed and an error rate calculated therefrom. The error rates can then be reliably projected on the total corpus, having a margin of error directly related to the sample size.

3. Issue Tags. The parties agree that, to the extent applicable, as part of the seed set training described above, as well as during the iterative review process, all documents categorized as relevant and not privileged, to the extent applicable, also shall be coded with one or more of the following agreed-upon issue tags:

- a. Reorganization.
- b. Promotion/Assignments.
- c. Work/Life Balance.
- d. Termination.
- e. Compensation.
- f. Maternity/Pregnancy.
- g. Complaints/HR.

h. Publicis Groupe/Jurisdiction.

This issue coding will take place during the initial random sample, creation of the seed set and initial and iterative training (see paragraphs 4, 5 and 6 below). This input shall be provided to Plaintiffs' counsel along with the initial document productions. Plaintiffs' counsel shall promptly report any disagreements on classification, and the parties shall discuss these issues in good faith, so that the seed set training may be improved accordingly. This issue-tagging and disclosure shall take place during the described collaborative seed set training process. The disclosures here made by MSL on its issue coding are not required in the final production set.

4. Initial Random Sample. Using the Axcelerate software to generate a random sample of the entire corpus of documents uploaded to the Axcelerate search and review platform, MSL's attorneys will conduct a review of the random sample for relevance and to develop a baseline for calculating recall and precision. To the extent applicable, any relevant documents also will be coded with one or more of the issue tags referenced in paragraph E.3 above. The random sample consists of 2,399 documents, which represents a 95% confidence level with a confidence estimation of plus or minus 2%. The Parties agree to utilize the random sample generated prior to the finalization of this protocol. However, during Plaintiffs' counsel's review of the random sample, they may advise as to whether they believe any of the documents should be coded with one or more of the subsequently added issue codes (i.e., Complaints/HR and Publicis Groupe/Jurisdiction) and will, as discussed above, indicate any disagreement with MSL's classifications.

5. Seed Set.

a. Defendant MSL. To create the initial seed set of documents that will be used to "train" the Axcelerate software as described generally above, MSL primarily utilized keywords listed on Exhibits A and B to this protocol, but also utilized other judgmental analysis

and search techniques designed to locate highly relevant documents, including the Boolean, concept search and other features of Axcelerate. Given the volume of hits for each keyword (Exhibit A), MSL reviewed a sampling of the hits and coded them for relevance as well as for the following eight preliminary issues: (i) Reorganization; (ii) Promotion; (iii) Work/Life Balance; (iv) Termination; (v) Compensation; and (vi) Maternity. Specifically, except for key words that were proper names, MSL performed several searches within each set of key word hits and reviewed a sample of the hits. The Axcelerate software ranked the hits in order of relevance based on the software's analytical capabilities and the documents were reviewed in decreasing order of relevance (i.e., each review of the sample of supplemental searches started with the highest ranked documents). Exhibit B identifies the supplemental searches conducted, the number of hits, the number of documents reviewed, the number of documents coded as potentially responsive and general comments regarding the results. In addition, to the extent applicable, documents coded as responsive also were coded with one or more issue tags. MSL will repeat the process outlined above and will include the newly defined issues and newly added custodians. MSL will provide Plaintiffs' counsel with all of the non-privileged documents and will provide, to the extent applicable, the issue tag(s) coded for each document, as described above. Plaintiffs' counsel shall promptly review and provide notice as to any documents with which they disagree where they do not understand the coding. If necessary, counsel will meet and confer to attempt to resolve any disagreements regarding the coding applied to the documents in this seed set.

b. Plaintiffs. To help create the initial seed set of documents that will be used to "train" the Axcelerate software, Plaintiffs provided a list of potential key words to MSL. MSL provided Plaintiffs with a hit list for their proposed key words. This process was repeated twice with the hit list for Plaintiffs' most recent set of keywords attached as Exhibit C. MSL

will review 4,000 randomly sampled documents from Plaintiffs' supplemental list of key words to be coded for relevance and issue tags. MSL will provide Plaintiffs' counsel with all non-privileged documents and will provide, to the extent applicable, the issue tag(s) coded for each document. Plaintiffs' counsel shall promptly review and provide notice as to any documents with which they disagree with or where they do not understand the coding. If necessary, the Parties' counsel will meet and confer to attempt to resolve any disagreements regarding the coding applied to the documents in this seed set.

c. Judgmental Sampling. In addition to the above, a number of targeted searches were conducted by MSL in an effort to locate documents responsive to several of Plaintiffs' specific discovery requests. Approximately 578 documents have already been coded as responsive and produced to Plaintiffs. In addition, several judgmental searches were conducted which resulted in approximately 300 documents initially being coded as responsive and several thousand additional documents coded as irrelevant. The documents coded as relevant and non-privileged also will be reviewed by Plaintiffs' counsel and, subject to their feedback, included in the seed set. An explanation shall be provided by MSL's attorneys for the basis of the bulk tagging of irrelevant documents (primarily electronic periodicals and newsletters that were excluded in the same manner as spam junk mail is excluded). The explanation shall include the types of documents bulk tagged as irrelevant as well as the process used to identify those types of documents and other similar documents that were bulk tagged as irrelevant.

6. Initial And Iterative Training. Following the creation of the first seed set, the Axcelerate software will review the entire data set to identify other potentially relevant documents. MSL will then review and tag a judgmental based sample, consisting of a minimum of 500 documents, including all documents ranked as *highly relevant* or *hot*, of the new

“Computer Suggested” documents, which were suggested by the Axcelerate software. MSL’s attorneys shall act in consultation with the Axcelerate software experts to make a reasonable, good faith effort to select documents in the judgmental sample that will serve to enhance and increase the accuracy of the predictive coding functions. The results of this first iteration, both the documents newly coded as relevant and not relevant for particular issue code or codes, will be provided to Plaintiffs’ counsel for review and comment. (All documents produced by the parties herein to each other, including, without limitation, these small seed set development productions, shall be made under the Confidentiality Stipulation in this matter as well as any clawback agreement that shall be reduced to an order acceptable to the Court. Any documents marked as irrelevant shall be returned to counsel for MSL at the conclusion of the iterative training phase, unless the relevancy of any documents are disputed, in which case they may be submitted to the Court for review.)

Upon completion of the initial review, and any related meet and confer sessions and agreed upon coding corrections, the Axcelerate software will be run again over the entire data set for suggestions on other potentially relevant documents following the same procedures as the first iteration. The purpose of this second and any subsequent iterations of the Predictive Coding process will be to further refine and improve the accuracy of the predictions on relevance and various other codes. The results of the second iteration shall be reviewed and new coding shared with Plaintiffs’ counsel as described for the first iteration. This process shall be repeated five more times, for a total of seven iterations, unless the change in the total number of relevant documents predicted by the system as a result of a new iteration, as compared to the last iteration, is less than five percent (5%), and no new documents are found that are predicted to be *hot* (aka *highly relevant*), at which point MSL shall have the discretion to stop the iterative process and begin the final review as next described. If more than 40,000 documents are

returned in the final iteration, then MSL reserves the right to apply to the Court for relief and limitations in its review obligations hereunder. Plaintiffs reserve the right, at all times, to challenge the accuracy and reliability of the predictive coding process and the right to apply to the Court for a review of the process.

7. Final Search and Production. All of the documents predicted to be relevant in the final iteration described in paragraph six above will be reviewed by MSL, unless it applies to the court for relief hereunder. All documents found by MSL's review to be relevant and non-privileged documents will be promptly produced to Plaintiffs. If more than 40,000 documents are included in the final iteration, then MSL reserves its right to seek payment from Plaintiffs for all reasonable costs and fees MSL incurred related to the attorney review and production of more than 40,000 documents. ~~This provision is not intended as a waiver by MSL to also seek an award of all discovery costs incurred, including costs related to the first 40,000 documents, at the conclusion of this action under 28 U.S.C. §1920(4) and Rule 54(d)(1) *Federal Rules of Civil Procedure*. [Plaintiffs object to the inclusion of MSL's proposed cost-shifting language as premature and argumentative, in contravention of the Court's January 4, 2012 and February 8, 2012 orders. Plaintiffs believe costs should be subject to a separate hearing.]~~

8. Quality Control by Random Sample of Irrelevant Documents. In addition, at the conclusion of this search protocol development process described above, and before the final search and production described in Paragraph 7 above, MSL will review a random sample of 2,399 documents contained in the remainder of the database that were excluded as irrelevant. The results of this review, both the documents coded as relevant and not relevant, but not privileged, will be provided to Plaintiffs' counsel for review. (Any documents initially coded as "not relevant" will be provided subject to the Confidentiality Stipulation and any clawback agreements entered in this matter will be returned to counsel for MSL within 60 days of their

production.) The purpose for this review is to allow calculation of the approximate degree of recall and precision of the search and review process used. If Plaintiffs object to the proposed review based on the random sample quality control results, or any other valid objection, they shall provide MSL with written notice thereof within five days of the receipt of the random sample. The parties shall then meet and confer in good faith to resolve any difficulties, and failing that shall apply to the Court for relief. MSL shall not be required to proceed with the final search and review described in Paragraph 7 above unless and until objections raised by Plaintiffs have been adjudicated by the Court or resolved by written agreement of the Parties.

F. Costs

AD 1. MSL proposes to limit the costs of its final review and production of responsive ESI from the MSL email collection to an additional \$200,000, above and beyond the approximately \$350,000 it has already paid or is anticipated to pay in e-discovery related activities as previously described and disclosed to Plaintiffs. ~~Specifically, although MSL potentially will conduct and pay for review of more than 40,000 documents, if that is required under the predictive coding process described in paragraphs 6 and 7 above, MSL reserves its right to seek relief from the Court (e.g., a cost shifting award and/or ruling that MSL need to review more than a specified number of documents) pursuant to the principles of proportionality. See Rule 1, Rule 26(b)(2)(C), Rule 26(b)(2)(B), and Rule 26(g), *Federal Rules of Civil Procedure*; *Commentary on Proportionality in Electronic Discovery*, 11 SEDONA CONF. J. 289 (2010); Oot, *et al*, *Mandating Reasonableness in a Reasonable Inquiry*, *Denver University Law Review*, 87:2, 522-559 (2010); Also see Rule 403 of the *Federal Evidence Code* (inadmissibility of cumulative evidence). **[Plaintiffs object to the inclusion of MSL's proposed cost-shifting language as premature and argumentative, in contravention of the Court's January 4, 2012**~~

~~and February 8, 2012 orders. Plaintiffs believe costs should be subject to a separate hearing.]~~

2. Plaintiffs agree to bear all of the costs associated with their compliance with the terms of this protocol and with the receipt and review of ESI produced hereunder including the costs associated with its ESI experts at DOAR Litigation Consulting who will be involved with Plaintiffs in all aspects of this ESI protocol. Plaintiffs propose that MSL bear all of the costs associated with its obligations under the terms of this protocol and do not agree to limit the amount of information subject to the review and production of ESI by MSL.

G. Format of Production For Documents Produced From Axcelerate

1. TIFF/Native File Format Production. Documents will be produced as single-page TIFF images with corresponding multi-page text and necessary load files. The load files will include an image load file as well as a metadata (.DAT) file with the metadata fields identified on Exhibit D. Defendant MSL will produce spreadsheets (.xls files) and PowerPoint presentations (.ppt files) in native form as well as any documents that cannot be converted to TIFF format (e.g., audio or video files, such as mp3s, wavs, megs, etc.). In addition, for any redacted documents that are produced, the documents' metadata fields will be redacted where required. For the production of ESI from non-email sources, the parties will meet and confer to attempt to reach an agreement of the format of production.

2. Appearance. Subject to appropriate redaction, each document's electronic image will convey the same information and image as the original document. Documents that present imaging or formatting problems will be promptly identified and the parties will meet and confer in an attempt to resolve the problems.

3. Document Numbering. Each page of a produced document will have a legible, unique page identifier "Bates Number" electronically "burned" onto the image at a location

that does not obliterate, conceal or interfere with any information from the source document. The Bates Number for each page of each document will be created so as to identify the producing party and the document number. In the case of materials redacted in accordance with applicable law or confidential materials contemplated in any Confidentiality Stipulation entered into by the parties, a designation may be “burned” onto the document’s image at a location that does not obliterate or obscure any information from the source document.

4. Production Media. The producing party will produce documents on readily accessible, computer or electronic media as the parties may hereafter agree upon, including CD-ROM, DVD, external hard drive (with standard PC compatible interface), (the “Production Media”). Each piece of Production Media will be assigned a production number or other unique identifying label corresponding to the date of the production of documents on the Production Media (e.g., “Defendant MSL Production April 1, 2012”) as well as the sequence of the material in that production (e.g. “-001”, “-002”). For example, if the production comprises document images on three DVDs, the producing party may label each DVD in the following manner “Defendant MSL Production April 1, 2012”, “Defendant MSL Production April 1, 2012-002”, “Defendant MSL Production April 1, 2012-003.” Additional information that will be identified on the physical Production Media includes: (1) text referencing that it was produced in *da Silva Moore v. Publicis Groupe SA, et al.*; and (2) the Bates Number range of the materials contained on the Production Media. Further, any replacement Production Media will cross-reference the original Production Media and clearly identify that it is a replacement and cross-reference the Bates Number range that is being replaced.

5. Write Protection and Preservation. All computer media that is capable of write-protection should be write-protected before production.

6. Inadvertent Disclosures. The terms of the Parties' Clawback Agreement and Court Order shall apply to this protocol.

7. Duplicate Production Not Required. A party producing data in electronic form need not produce the same document in paper format.

H. Timing.

1. To the extent a timeframe is not specifically outlined herein, the parties will use their reasonable efforts to produce ESI in a timely manner consistent with the Court's discovery schedule.

2. The parties will produce ESI on a rolling basis.

I. General Provisions.

1. Any practice or procedure set forth herein may be varied by agreement of the parties, and first will be confirmed in writing, where such variance is deemed appropriate to facilitate the timely and economical exchange of electronic data.

2. Should any party subsequently determine it cannot in good faith proceed as required by this protocol, the parties will meet and confer to resolve any dispute before seeking Court intervention.

3. The Parties agree that e-discovery will be conducted in phases and, at the conclusion of the search process described in Section E above, the Parties will meet and confer regarding whether further searches of additional custodians and/or the Phase II sources is warranted and/or reasonable. If agreement cannot be reached, either party may seek relief from the Court.

J. Plaintiffs' Objection

1. Plaintiffs object to this ESI Protocol in its entirety. Plaintiffs submitted their own proposed ESI Protocol to the Court, but it was largely rejected. The Court then ordered the parties to submit a joint ESI Protocol reflecting the Court's rulings. Accordingly, Plaintiffs jointly submit this ESI Protocol with MSL, but reserve the right to object to its use in this case.

This protocol may be executed in counterparts. Each counterpart, when so executed, will be deemed and original, and will constitute the same instrument.

By: _____
JANETTE WIPPER, ESQ.
DEEPIKA BAINS, ESQ.
SIHAM NURHUSSEIN, ESQ.

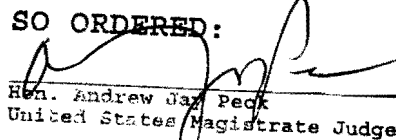
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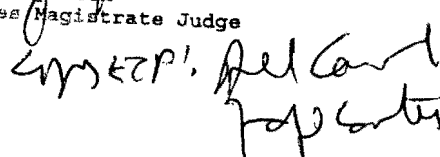
Date: _____, 2012

Date: _____, 2012

SO ORDERED:


Hon. Andrew Jay Peck
United States Magistrate Judge

2/22/12

ENTERED: 
FEB 22 2012

BY ECCE

Search Term	Hits
"Anita"	70,376
"Binkowski"	43,890
"Bonus"	40,756
"Branam"	66,959
"Centralized Management Team"	3
"Compensation"	55,602
"Complaint "	8,672
"da Silva" OR "daSilva"	201,179
"Discrimination"	7,211
"Diversity "	38,315
"Ellena"	6,853
"Exception"	17,354
"Fite"	290,518
"Friedman"	34,304
"Healthcare"	242,054
"Heather" /2 "Pierce"	36,317
"Hiring Freeze"	694
"Jud"	70,352
"Kate" /2 "Wilkinson"	93,107
"Kelly" /2 "Denker"	328
"Krista"	38,346
"Laurie" /2 "Mayers"	137,706
"Lilien"	299,955
"Lund"	353,246
"Manning"	170,064
"Mark" /2 "Hass"	26,195
"MaryEllen" OR "Mary Ellen"	160,491
"Masini"	242,991
"Maternity Leave"	13,210
"Mission Critical"	4,399
"Monique"	210,734
"North American Leadership"	520
"Organization Chart" OR "Org Chart"	6,618
"O'Donohue" OR "Odonohue" OR "O Donohue"	156,070
"Performance Evaluation"	2,140
"PMP"	4,987
"Pregnancy"	10,659

"Promotion"	73,925
"Raise"	60,272
"Regional Leadership Team"	71
"Relocation"	9,113
"Reorganization"	5,816
"Rita"	252,314
"Salary Freeze"	895
"Tara"	360,352
"Termination"	18,204
"Training"	165,208
"Transfer"	39,252
"Vickie"	292,868
"Webster"	59,925
"Wendy "	380,940
"Work/Life Balance" OR "Work-Life Balance" OR "Work Life Balance"	2,671
(Bill OR Will OR William) /2 "Orr"	36,108
(Dave OR David) /2 "Chamberlain"	846
(Dave OR David) /2 Binkowski	42,978
(Don OR Donald) /2 "Hannaford"	20,046
(Ed OR Edward OR Eduard) /2 Cafasso	40,023
(Jim OR James) /2 "Tsokanos"	247,162
(Joe OR Joseph) /2 "Carberry"	28,510
(Mike OR Michael) /2 "Manning"	7,179
(Mike OR Michael) /2 "Morsman"	11,445
(Mike OR Michael) /2 Sullivan	12,492
(Steve* OR Steph*) /2 Chipman	3,525
Alicia /2 Dorset	26,661
Jeanine /2 ("O'Kane" OR Okane OR "O Kane")	166,224
Joel /2 "Curran"	50,956
Karl* /2 Trimble	52,753
Kath* /2 "Wilkinson"	2,053
Keith /2 Hughes	5,040
Kelly /2 McKenna	26,354
Michelle /2 Parisi	158
Nancy /2 "Brennan"	236,288
Nancy /2 Glick	14,735
Neil /2 "Dhillon"	43,555
Pete* /2 "Harris"	62,388
Pete* /2 Miller	229,255
Scott /2 Beaudoin	24,075
Stu* /2 "Wilson"	12,556

Initial Term	Combined With	Document Count	# Reviewed	# Potentially Responsive	Comments
Training	Da Silva Moore	133	50	0	
	Mayers	5,744	50	32	20 of the e-mails reviewed concern media training from third parties (such as LinkedIn and PR Press).
	O'Donohue	4,767	50	16	Many of the e-mails concern training that MSL offers to clients.
	Pierce	2,953	50	48	10 of the e-mails reviewed concerned training offered to Pierce.
	Wilkinson	4,727	50	47	30 of the e-mails reviewed concern training that Wilkinson offered. The remaining 20 that were reviewed concerned training the Wilkinson was offered.
	Hubbard	925	50	38	20 of the e-mails reviewed concerned training offered to Hubbard.
	Perlman	8,233	60	48	30 of the e-mails reviewed concerned training offered to Perlman.
	Raise	13,637	50	0	The term raise was not used in the context of compensation.
	Bonus	7,881	50	0	806 of the e-mails were from third parties such as LinkedIn and Uptilt.com. Also, the term "bonus" frequently was used to in the context of including something for free, e.g., a "bonus issue."
	Termination	4,074	25	0	Many of the e-mails were from third parties advertising training on employment related issues, such as hiring and termination.
	Maternity Leave	1,449	115	41	
	Complaint	2,012	110	0	
	Org Chart	844	80	3	
	PMP	1,841	50	0	15 of the e-mails reviewed concerned the scheduling of PMP training for various employees
	Work/Life Balance	1,031	80	8	
Raise	Performance Evaluation	961	50	0	10 of the e-mails reviewed concerned training on the performance evaluation software.
	Hiring Freeze	392	50	4	15 of the emails reviewed were from third party periodicals.
	Regional Leadership Team	31	20	0	
	Transfer	8,525	40	0	
	Da Silva Moore	62	30	0	
	Mayers	3,396	50	0	Many e-mails use the word "raise" in a context not related to compensation.
	O'Donohue	2,488	50	10	Many e-mails use the word "raise" in a context not related to compensation.
	Pierce	1,839	50	1	Many e-mails use the word "raise" in a context not related to compensation.
	Wilkinson	2,654	50	0	Many e-mails use the word "raise" in a context not related to compensation.
	Hubbard	288	50	1	Many e-mails use the word "raise" in a context not related to compensation.

Initial Term	Combined With	Document Count	# Reviewed	# Potentially Responsive	Comments
	Perلمان	4,163	50	2	Many e-mails use the word "raise" in a context not related to compensation.
	Training	13,367	50	0	Many e-mails use the word "raise" in a context not related to compensation.
	Bonus	2,852	50	50	All reviewed e-mails discuss raises and bonuses for various employees.
	Termination	1,407	50	4	3 e-mails discuss the termination of a project.
	Maternity Leave	504	50	2	Many e-mails use the word "raise" in a context not related to compensation.
	Complaint	1,357	50	3	20 of the e-mails reviewed were from third parties such as HR Daily.
	Org Chart	268	40	7	
	PMP	177	50	0	10 of the e-mails reviewed concern employees discussion their social plans.
	Work/Life Balance	391	30	0	15 of the e-mails reviewed were from third parties discussing the importance of work/life balance.
	Performance Evaluation	330	50	2	15 of the e-mails reviewed were from third parties discussing the importance of work/life balance.
	Hiring Freeze	95	40	10	10 of the e-mails reviewed discuss the relationship between the hiring freeze and requests for employee raises.
	Regional Leadership Team	1	1	0	
	Transfer	3,314	30	7	1 e-mail reviewed concerned Perlman being provided a raise.
Bonus	Da Silva Moore	20	20	0	
	Mayers	1,218	30	10	10 of the e-mails reviewed concern "bonus miles" from third parties.
	O'Donohue	388	30	0	30 of the e-mails reviewed concern "bonus products" from Lancome.
	Pierce	432	30	0	20 of the e-mails reviewed concern bonus Amtrak miles.
	Wilkinson	1,862	30	0	10 of the e-mails reviewed concern Google Bonus.
	Hubbard	188	30	0	10 of the e-mails reviewed concern "bonus" HR e-mails from third parties.
	Perlman	1,166	40	5	30 of the e-mails reviewed concern bonus miles.
	Training	7,881	50	2	35 e-mails reviewed concern "bonus" emails from HR publications.
	Raise	2,852	50	50	
	Termination	1,620	50	8	20 e-mails reviewed are from third-party periodicals.
	Maternity Leave	527	30	8	10 of the e-mails reviewed are from third-party periodicals.
	Complaint	633	40	10	20 of the e-mails reviewed concern "bonus miles".
	Org Chart	141	30	0	20 of the e-mails reviewed concern internal audits.
	PMP	140	20	6	10 of the e-mails reviewed concern employee compensation review. A few duplicate responsive documents.

Initial Term	Combined With	Document Count	# Reviewed	# Potentially Responsive	Comments
	Work/Life Balance	225	20	0	15 of the emails reviewed are from third-party publications.
	Performance Evaluation	616	30	0	10 of the emails reviewed are from third-party publications.
	Hiring Freeze	93	20	16	15 of the emails reviewed concern the hiring freeze's effect on employee compensation.
	Regional Leadership Team	2	2	0	
	Transfer	4,336	30	1	15 of the emails reviewed concern transferring bonus airline miles.
Termination	Da Silva Moore	32	20	0	
	Mayers	577	30	4	10 of the emails reviewed are from third party-publications
	O'Donohue	208	30	0	
	Pierce	208	20	7	7 of the emails reviewed concern Pierce's resignation.
	Wilkinson	299	20	8	8 of the emails reviewed concern the cessation of Wilkinson's employment.
	Hubbard	59	20	0	10 of the emails reviewed are from third-party publications.
	Perlman	583	20	0	7 of the emails reviewed are from third-party publications.
	Training	4,074	30	0	20 of the emails reviewed are from third-party publications.
	Raise	1,620	30	5	15 of the emails reviewed are from third-party publications.
	Maternity Leave	425	30	7	5 of the emails reviewed are from third party publications
	Complaint	1,055	30	0	
	Org Chart	34	20	5	10 emails reviewed are from third-party publications.
	PMP	52	20	3	10 emails reviewed are from third-party publications.
	Work/Life Balance	75	30	2	15 emails reviewed are from third-party publications.
	Performance Evaluation	377	30	0	10 emails reviewed are blank performance evaluation forms.
	Hiring Freeze	19	19	2	15 of the emails reviewed are from third-party publications.
	Regional Leadership Team	4	4	3	
	Transfer	3,713	30	20	15 of the emails reviewed concern employees being terminated.
Maternity Leave	Da Silva Moore	75	20	7	7 of the emails reviewed concern da Silva Moore giving birth.
	Mayers	286	25	15	20 of the emails reviewed concern employees taking maternity leave.
	O'Donohue	515	30	26	20 of the emails reviewed concern employees taking maternity leave.
	Pierce	1,528	30	30	10 of the emails reviewed concern Pierce's maternity leave plan.
	Wilkinson	519	20	20	10 of the emails reviewed concern employees taking maternity leave.

Initial Term	Combined With	Document Count	# Reviewed	# Potentially Responsive	Comments
	Hubbard	18	10	10	10 of the emails reviewed concern employees taking maternity leave.
	Perlman	609	20	20	20 of the emails reviewed concern employees taking maternity leave.
	Training	1,449	25	30	20 of the emails reviewed concern employees taking maternity leave.
	Bonus	527	30	16	10 of the emails concern employees receiving bonuses upon their return from maternity leave.
	Termination	425	20	9	
	Raise	504	20	16	5 of the emails reviewed use the term raise in a non-monetary way.
	Complaint	205	20	0	
	Org Chart	84	20	12	
	PMP	70	10	0	6 of the emails reviewed include the word PMP in the email tag.
	Work/Life Balance	85	20	18	15 of the emails reviewed concern the possibility of offering an employee a flexible schedule upon returning from maternity leave.
	Performance Evaluation	160	20	2	2 of the emails reviewed concern employee performance evaluations.
	Hiring Freeze	1	1	0	
	Regional Leadership Team	0	0	0	
	Transfer	807	20	1	3 of the emails reviewed concern employees' assignments being transferred to others.
Complaint	Da Silva Moore	103	10	0	
	Mayers	854	30	0	20 of the emails reviewed concern customer complaints.
	O'Donohue	159	20	0	15 of the emails reviewed are from third-party publications.
	Pierce	296	30	0	10 of the emails reviewed concern employee complaints.
	Wilkinson	333	20	0	2 of the emails reviewed are correspondence between Wilkinson and her husband.
	Hubbard	52	10	0	3 of the emails reviewed are from third-party publications.
	Perlman	410	20	0	5 of the emails reviewed are from third-party publications.
	Training	2,012	30	0	25 of the emails reviewed are from third-party publications.
	Bonus	633	20	10	10 of the emails reviewed concern an employee receiving a spot bonus.
	Termination	1,055	30	0	
	Raise	1,357	50	3	20 of the emails reviewed are from third party-publications.
	Maternity Leave	205	20	0	
	Org Chart	42	20	0	10 of the emails reviewed are from third-party publications.
	PMP	39	20	0	
	Work/Life Balance	75	10	0	6 of the emails reviewed are from third party-publications.
	Performance Evaluation	172	20	0	5 of the emails reviewed are from third-party publications.

Initial Term	Combined With	Document Count	# Reviewed	# Potentially Responsive	Comments
	Hiring Freeze	1	1	0	
	Regional Leadership Team	0	0	0	
	Transfer	935	30	0	4 of the emails reviewed concern customer complaints.
Org Chart	Da Silva Moore	0	0	0	
	Mayers	226	30	0	Many of the e-mails discussed a need to create an org chart or the concept of an org chart (i.e., in the context of an RFP seeking an org chart), but did not attach an actual org chart.
	O'Donohue	301	20	0	See above comment.
	Pierce	102	30	0	See above comment.
	Wilkinson	49	20	0	See above comment.
	Hubbard	6	6	0	6 of the emails reviewed are from third-party publications.
	Perlman	83	25	0	Many of the e-mails discussed a need to create an org chart or the concept of an org chart (i.e., in the context of an RFP), but did not attach an actual org chart.
	Training	844	80	3	
	Bonus	141	30	0	20 of the emails reviewed concern internal audits.
	Termination	34	20	5	10 of the emails reviewed are from third-party publications.
	Raise	268	40	7	
	Maternity Leave	84	20	12	10 of the emails reviewed concern org charts for employees assigned to specific clients.
	Complaint	42	20	0	10 of the emails reviewed are from third-party publications.
	PMP	17	17	0	
	Work/Life Balance	28	20	7	4 of the emails reviewed concern org charts for particular projects.
	Performance Evaluation	21	21	0	10 of the emails reviewed concern individuals who are seeking employment.
	Hiring Freeze	0	0	0	
	Regional Leadership Team	0	0	0	
	Transfer	101	20	1	
PMP	Da Silva Moore	0	0	0	
	Mayers	239	20	0	10 of the emails reviewed concern invitations to PMP training.
	O'Donohue	10	10	0	
	Pierce	7	7	0	3 of the emails reviewed are Google alerts.
	Wilkinson	38	10	0	5 of the emails are viewed are third-party publications.
	Hubbard	5	5	0	
	Perlman	166	10	0	4 of the emails reviewed are invitations to PMP training seminars.
	Training	1,841	50	0	20 of the emails reviewed concern finalizing PMP training materials.
	Bonus	140	20	6	10 of the emails reviewed concern employee compensation review.

Initial Term	Combined With	Document Count	# Reviewed	# Potentially Responsive	Comments
	Termination	52	20	3	10 of the emails reviewed are from third-party publications.
	Maternity Leave	70	10	0	6 of the emails reviewed contain PMP in the email signature tag.
	Complaint	39	20	0	
	Org Chart	17	17	0	
	Raise	177	50	0	10 of the emails reviewed concern employees socializing after PMP training.
	Work/Life Balance	14	10	0	
	Performance Evaluation	17	17	0	
	Hiring Freeze	23	10	1	1 email reviewed concerns the effect of the recession on their business.
	Regional Leadership Team	0	0	0	
	Transfer	146	20	0	5 of the emails reviewed are action verb summaries to be used in connection with employee performance evaluations.
Work/Life Balance	Da Silva Moore	0	0	0	
	Mayers	84	20	10	10 of the emails reviewed concern webinars advocating work/life balance.
	O'Donohue	64	10	5	
	Pierce	68	20	0	15 of the emails reviewed are from third-party publications.
	Wilkinson	88	20	6	
	Hubbard	28	10	0	5 of the emails reviewed are from third-party publications.
	Perfman	47	20	12	
	Training	1,223	80	8	50 of the emails reviewed are from third party publications.
	Bonus	289	20	0	15 of the emails reviewed are from third party periodicals.
	Termination	84	30	2	15 of the emails reviewed are from third party publications.
	Maternity Leave	143	20	18	15 of the emails reviewed concern the possibility of offering an employee a flexible schedule upon returning from maternity leave.
	Complaint	107	10	0	6 of the emails reviewed are from third-party publications.
	Org Chart	213	20	7	4 of the emails reviewed concern org charts for particular projects.
	PMP	14	10	0	
	Raise	451	40	0	15 of the emails reviewed are from third-party publications discussing the importance of a work/life balance.
	Performance Evaluation	246	20	3	5 of the emails reviewed are from third party publications concerning the importance of a work/life balance.
	Hiring Freeze	53	10	0	5 of the emails reviewed are from third-party publications.
	Regional Leadership Team	1	1	0	
	Transfer	186	30	0	20 of the emails reviewed are from third-party publications.

Initial Term	Combined With	Document Count	# Reviewed	# Potentially Responsive	Comments
Performance Evaluation	Da Silva Moore	8	8	0	
	Mayers	24	24	0	
	O'Donohue	26	26	0	
	Pierce	15	15	0	2 of the emails reviewed are from third-party publications.
	Wilkinson	8	8	0	
	Hubbard	16	16	0	6 of the emails reviewed are from third-party publications.
	Perlman	43	30	0	15 of the emails reviewed concern the Company's evaluation of its own clients.
	Training	961	50	0	10 of the emails reviewed concern the need to be trained on performance evaluation software.
	Bonus	651	30	0	10 of the emails reviewed are from third-party publications.
	Termination	377	30	0	10 of the emails reviewed are blank performance evaluation forms.
	Maternity Leave	160	20	2	
	Complaint	344	20	0	5 of the emails reviewed are from third-party publications.
	Org Chart	21	21	0	10 of the emails reviewed concern individuals who are seeking employment.
	PMP	17	17	0	
	Work/Life Balance	246	20	3	6 of the emails reviewed are from third-party publications.
	Raise	330	50	2	15 of the emails reviewed are from third-party periodicals discussing how to handle performance evaluations.
	Hiring Freeze	4	4	0	
	Regional Leadership Team	0	0	0	
	Transfer	293	20	16	16 of the emails reviewed concern the company's internal mobility policy.
Hiring Freeze	Da Silva Moore	0	0	0	
	Mayers	30	30	6	
	O'Donohue	9	9	0	
	Pierce	7	7	0	7 of the emails reviewed are from third-party publications.
	Wilkinson	22	20	0	15 of the emails reviewed are from third-party publications.
	Hubbard	13	13	11	
	Perlman	10	10	1	2 of the emails reviewed are from third-party publications.
	Training	392	50	4	15 of the emails reviewed were from third-party publications.
	Bonus	93	20	16	15 of the emails reviewed concern the hiring freeze's effect on employee compensation.
	Termination	19	19	2	15 of the emails reviewed are from third-party publications.
	Maternity Leave	1	1	0	
	Complaint	1	1	0	
	Org Chart	0	0	0	
	PMP	23	10	1	1 email reviewed concerns the effect of the recession on their business.

Initial Term	Combined With	Document Count	# Reviewed	# Potentially Responsive	Comments
	Work/Life Balance	53	10	0	5 of the emails are from third-party publications.
	Performance Evaluation	4	4	0	
	Raise	95	40	10	10 of the emails reviewed concern the relationship between the hiring freeze and the request for employee raises.
	Regional Leadership Team	0	0	0	
	Transfer	29	10	0	The term transfer is often used to mean "to transfer" information.
Regional Leadership Team	Da Silva Moore	0	0	0	
	Mayers	0	0	0	
	O'Donohue	0	0	0	
	Pierce	0	0	0	
	Wilkinson	0	0	0	
	Hubbard	0	0	0	
	Perlman	0	0	0	
	Training	31	20	0	10 of the emails reviewed generally mention training and the regional management team.
	Bonus	2	2	0	
	Termination	4	4	3	
	Maternity Leave	0	0	0	
	Complaint	0	0	0	
	Org Chart	1	1	0	
	PMP	0	0	0	
Transfer	Work/Life Balance	1	1	0	
	Performance Evaluation	0	0	0	
	Hiring Freeze	0	0	0	
	Raise	1	1	0	
	Transfer	3	3	0	
	Da Silva Moore	10	10	0	
	Mayers	2,390	30	2	20 of the emails reviewed concern the transfer of electronic files.
	O'Donohue	773	30	0	The term transfer is used in various ways that are irrelevant to this action.
	Pierce	958	30	13	6 of the emails reviewed concern Pierce being transferred to the DC office.
	Wilkinson	2,040	30	1	The term transfer is used in various ways that are irrelevant to this action.
	Hubbard	256	20	0	The term transfer is used in various ways that are irrelevant to this action.
	Perlman	2,474	40	0	The term transfer is used in various ways that are irrelevant to this action.
	Training	31	20	0	10 of the emails reviewed generally mention training and the regional management team.
	Bonus	2	2	0	
	Termination	4	4	3	
	Maternity Leave	0	0	0	
	Complaint	0	0	0	
	Org Chart	1,180	30	1	

Initial Term	Combined With	Document Count	# Reviewed	# Potentially Responsive	Comments
	PMP	146	20	0	5 of the emails reviewed are action verb summaries to be used in connection with employee performance evaluations.
	Work/Life Balance	186	30	0	20 of the emails reviewed are from third-party publications.
	Performance Evaluation	293	20	16	16 of the emails reviewed concern the company's internal mobility policy.
	Hiring Freeze	29	10	0	
	Raise	1	1	0	
	Regional Leadership Team	3	3	0	
Healthcare	Da Silva Moore	205	80	0	Approximately 80 emails are privileged documents regarding the litigation; approximately 50 percent relate to travel arrangements and expense reports.
	Mayers	3,850	40	0	
	Pierce	5,125	50	0	20 of the emails related to details of specific project pursuits.
	Wilkinson	4,188	40	0	4 of the emails related to proposed rate reductions for P&G client with analysis of rates by title.
	Hubbard	717	30	0	
	Training	1,668	35	4	In-house training/refresher for HC practice area.
	Bonus	7,040	60	34	Responsive documents include proposed salary increases and bonuses for senior and other members of HC teams.
	w/p Termination	415	50	50	
	w/p Maternity Leave	123	20	20	Narrowed search reflects conversations re coverage for women out on leave.
	Org Chart	1,133	30	4	
	Work/Life Balance	721	20	10	
	Performance Evaluation	72	10	2	
	Hiring Freeze	159	15	1	Responsive documents relate to request to replace position even with hiring freeze.
	Salary Freeze	228	12	1	
	Transfer	170	16	4	2 responsive documents relate to possible transfer of daSilva Moore to Amsterdam in 1/09.
Promotion	Da Silva Moore	582	20	4	
	Mayers	89	12	0	
	Heather Pierce	431	20	0	
	Wilkinson	28	5	0	
	O'Donohue	6	6	0	
	w/p Maternity Leave	55	15	3	Narrowed search reflects promotions granted before maternity leave and business changes.
	Org Chart	365	20	1	
	Work/Life Balance	423	10	1	Search results indicate client survey documents and advertisements for training.
	Performance Evaluation	447	10	0	Narrowed search /p returned privileged documents.
	Raise	464	15	4	

Initial Term	Combined With	Document Count	# Reviewed	# Potentially Responsive	Comments
	Transfer	5,682	20	4	Narrowed search results by individual names yield fewer hits.
Compensation	Da Silva Moore	44	5	1	
	Mayers	34	10	1	
	Heather Pierce	589	10	2	
	Kate Wilkinson	351	10	0	Approximately 30 percent of results returned include profnet newsletter reports.
	O'Donohue	811	30	5	
	w/p Maternity Leave	95	10	4	Responsive documents include proposed phase back plan for employees returning from maternity leave.
	Work/Life Balance	661	25	1	
	Performance Evaluation	734	30	0	
	Hiring Freeze	194	20	2	
North American Leadership	Da Silva Moore	33	5	1	
Salary Freeze	Da Silva Moore	22	3	0	
	Mayers	9	7	0	
	Heather Pierce	4	4	0	
	Wilkinson	1	1	0	
	O'Donohue	11	3	0	
	Maternity Leave	12	5	1	
Centralized Management Team		3	3	0	
Pregnancy	Maternity Leave	374	10	0	
	Raise	105	30	0	
	daSilva Moore	445	30	4	
	Mayers	11	10	0	All documents are privileged attorney-client and/or work product communications.
	O'Donohue	22	10	2	Several of the documents are privileged communications.
	Pierce	34	7	1	Several documents are expense reports.
	Wilkinson	28	10	2	
	Discrimination	222	50	4	
	Work Life Balance	73	10	0	
Diversity	Da Silva Moore	98	30	0	30 of the emails reviewed concern a diversity project for GM.
	Mayers	2,452	30	0	11 emails are from third-party periodicals.
	Pierce	615	20	0	19 emails reviewed concern diversity programs for MSI clients.
	Wilkinson	3,447	30	0	15 emails reviewed concern diversity programs for MSI clients.
	O'Donohue	731	20	3	15 of the emails reviewed are "out of office" outlook auto-replies.
	Maternity Leave	2,465	30	30	
	Org Chart	1,137	30	2	15 of the emails concern org charts for individual offices.

Initial Term	Combined With	Document Count	# Reviewed	# Potentially Responsive	Comments
	Work/Life Balance	438	20	4	11 emails are from third-party periodicals
	Performance Evaluation	405	20	0	14 emails are resumes.
	Hiring Freeze	35	20	0	10 of the emails are from third-party periodicals
	Raise	4,337	30	0	15 of the emails are from third-party periodicals.
	Transfer	3,002	30	0	10 of the emails are from third-party periodicals.
Exception	Da Silva Moore	34	20	0	10 of the emails are from third-party periodicals
	Mayers	1,031	20	0	5 emails are from third-party periodicals.
	Pierce	433	20	0	
	Wilkinson	647	20	0	9 of the emails concern UPS deliveries.
	O'Donohue	371	20	0	11 of the emails concern O'Donohue's bills
	Maternity Leave	210	20	16	8 emails concern employees being on maternity leave.
	Org Chart	889	20	0	
	Work/Life Balance	98	10	2	6 emails are from third-party periodicals.
	Performance Evaluation	238	20	0	4 emails are blank performance evaluation forms.
	Hiring Freeze	69	10	0	
	Raise	2,635	20	13	13 emails concern employees receiving a promotion.
	Transfer	2,221	20	0	Transfer is often used in the context of transferring information.
Relocation	Da Silva Moore	18	10	0	
	Mayers	183	10	0	
	Pierce	83	10	0	4 emails are from individuals seeking employment.
	Wilkinson	1,074	20	0	10 emails concern prospective employees seeking to relocate.
	O'Donohue	79	10	0	
	Maternity Leave	197	20	7	7 emails discuss employees being out on maternity leave.
	Org Chart	890	20	0	
	Work/Life Balance	86	10	0	7 emails are from third-party periodicals.
	Performance Evaluation	246	20	0	16 emails are from individuals seeking employment.
	Hiring Freeze	4	4	0	4 emails are from third-party periodicals.
	Raise	948	20	0	
	Transfer	2,875	20	0	
Discrimination	Da Silva Moore	174	10	0	
	Mayers	279	10	0	6 emails are from third-party periodicals.
	Pierce	165	20	0	9 emails are from individuals seeking employment.
	Wilkinson	150	20	0	
	O'Donohue	146	10	0	4 emails are from third-party periodicals.
	Maternity Leave	258	20	0	
	Org Chart	829	20	0	
	Work/Life Balance	117	10	2	7 emails are from third-party periodicals.
	Performance Evaluation	286	20	0	14 emails are from third-party periodicals.

Initial Term	Combined With	Document Count	# Reviewed	# Potentially Responsive	Comments
	Hiring Freeze	51	10	0	7 emails are from third-party periodicals.
	Raise	1,153	20	0	15 emails are from third-party periodicals.
	Transfer	951	20	0	12 emails are from third-party periodicals.
Reorganization	Da Silva Moore	42	10	0	
	Mayers	882	20	0	
	Pierce	143	10	0	4 emails are from third-party periodicals.
	Wilkinson	213	20	1	12 emails are from third-party periodicals.
	O'Donohue	215	20	7	7 emails are from third-party periodicals.
	Maternity Leave	101	20	1	11 emails are from third-party periodicals.
	Org Chart	863	20	0	
	Work/Life Balance	21	21	0	16 emails are from third-party periodicals.
	Performance Evaluation	102	10	0	
	Hiring Freeze	19	19	0	10 emails are from third-party periodicals.
	Raise	1,260	20	3	8 emails are from third-party periodicals.
	Transfer	1,049	20	1	
Mission Critical	Da Silva Moore	2	2	0	
	Mayers	97	20	3	8 emails are from third-party periodicals.
	Pierce	8	8	0	
	Wilkinson	13	13	0	5 emails are from third-party periodicals.
	O'Donohue	186	10	0	
	Maternity Leave	186	20	20	20 emails discuss certain employees taking maternity leave.
	Org Chart	839	20	0	
	Work/Life Balance	35	10	0	10 emails are from third-party periodicals.
	Performance Evaluation	18	18	0	7 emails are from third-party periodicals.
	Hiring Freeze	11	11	9	9 emails discuss retaining employees.
	Raise	707	20	20	20 emails discuss retaining employees.
	Transfer	155	10	0	

Search Term	Document Hits
(approve OR approved OR approval OR approving OR reject OR rejected OR rejection OR rejecting) w/10 (policy OR policies OR tsokanos OR jim OR miller OR peter OR shapiro OR maury OR dhillon OR neil OR curran OR joel OR carberry OR wilson OR renee OR fite OR vicki OR baskin OR rob OR HR OR levy OR maurice OR fleurot OR olivier OR etienne OR "jean-michel" OR emmerich OR mathias OR paris OR publicis OR corporate OR headquarters OR "new york" OR cafasso OR gross OR bryant OR lillien OR lilien OR masini OR morgan OR valerie OR cofone OR tony OR anthony)	53,430
(assign OR assigning OR assignment OR assigned) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring OR app OR apply OR applied OR applies OR application OR applications OR job OR jobs OR position OR positions OR title OR titles OR work OR working OR career OR careers)	26,865
(assign OR assigning OR assignment OR assigned) w/10 (mckenna OR meadows OR green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR truco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mcclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	8,365
(award OR awards OR awarded OR awarding) w/10 (performance OR merit OR merits OR bonus OR bonuses)	7,937
(baby OR babies) w/10 (leave OR work OR working OR worklife OR "work-life" OR "work life" OR balance)	3,778
(balance OR balanced OR balancing) w/10 (career OR job OR work OR life OR worklife OR "work-life" OR hour OR hours OR schedule OR reduced OR family)	11,947
billable OR billability	44,294
bitch OR bitches OR bitchy	966
(bless OR blessed OR blessing OR blessings) w/10 (tsokanos OR jim OR corp OR corporate OR paris OR headquarters OR hq OR publicis)	309

(bonus OR bonuses) w/10 (policy OR policies OR contract OR contractual OR incentive OR "local office" OR performance OR discetionary OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR reinstate OR reinstated OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises)	21,679
OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lillien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	5,433
bsd	556
(career OR careers) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring)	32,909
OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lillien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	10,440

(central OR centralize OR centralized OR centralizing OR centrally) w/10 (management OR manager OR managers OR manage OR managed OR decision OR decisions OR decision-making OR "decision making" OR decision-maker OR "decision maker" OR leader OR leaders OR leadership OR lead OR team OR structure OR executive OR executives)	12,869
(chart or charts) w/10 (org OR organization)	9,266
(child OR children OR kid OR kids OR daughter OR daughters OR son OR sons OR baby OR babies OR family OR families) w/15 (pay OR paid OR raise OR raised OR raising OR raises OR promote OR promoted OR promoting OR promotion OR promotions OR job OR jobs OR manage OR manager OR MD OR management OR managed OR managing OR salary OR salaries OR bonus OR bonuses OR position OR positions OR career OR careers OR title OR titles OR support OR supported OR supporting OR comp OR comp OR compensate OR compensation OR compensating OR compensated OR because)	84,392
"class action"	5,425
(commission OR commissions) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises)	8,453
OR green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleuret OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	3,391
(comp OR compensation OR compensated OR compensating) w/10 (policy OR policies OR benchmark OR benchmarks OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises)	21,831

OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lillien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	77
(dick OR dicks) NOT ("rick" or "Richard" or "rich")	4,355
discriminate OR discriminated OR discriminates OR discrimination OR discriminator OR discriminators	13,829
(diversity OR diversification OR diversify) w/10 (gender OR sex OR women OR woman OR parent OR parents OR mother OR mothers OR mom OR moms OR initiative OR initiatives OR effort OR efforts OR policy OR policies OR practice OR practices)	8,991
(earn OR earned OR earnings OR earning OR earns) w/10 (except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises)	27,702
mckenna OR meadows OR green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lillien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	5,563
eeo	3,124
eeoc	3,331

regional OR west OR northeast OR midatlantic OR "mid-atlantic" OR midwest OR "mid-west" OR south OR "north america" OR Americas OR restructure OR restructuring OR restructured OR restructures OR reorg OR reorganization OR re-org OR re-organization OR "new vision" OR brand OR brands OR branded OR branding OR network OR team OR teams OR area OR areas OR lead OR leads OR leader OR leaders OR leaderships OR policy OR policies OR except OR exception OR excepted OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring OR headcount OR "head-count" OR layoff OR layoff* OR "lay-off" OR lay-offs OR leave OR plan OR plans OR planning OR planned OR audit OR audits OR auditing OR audited OR budget OR budgets OR budgeting OR budgeted OR rationale OR staff OR staffing OR staffed OR staffs OR personnel OR management OR manager OR managers OR manage OR managed OR decision OR decisions OR decision-making OR "decision making" OR decision-maker OR "decision maker" OR hire OR hires OR hiring OR hired OR retain OR retains OR retained OR retaining OR retention OR promote OR promoting OR promoted OR promotes OR promotion OR promotions OR compensation OR comp OR salary OR salaries	44,840
freeze OR freezes OR freezing OR froze OR frozen	17,234
gender	14,380
"glass ceiling"	689
harass OR harassing OR harassment OR harassed OR harasses	10,212
headcount OR "head-count" OR (head w/3 count)	19,298
"hfm"	17,794
(hire OR hires OR hired OR hiring) w/10 (except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring OR app OR apply OR applied OR applies OR application OR applications)	39,541

"MS&L Corp- Restructure"	9
onboard OR "on-board"	28,684
(opportunity OR opportunities) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring)	81,407
meadows OR green OR hubbard OR macLaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assoud" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannaforde OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR eglar OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	31,147
(org OR organization) w/10 (new OR change OR changing OR changes OR changed)	53,407
"part time" OR "part-time"	15,240
(pay OR pays OR paying OR paid) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises)	68,570

(plan OR plans OR planning OR planned OR audit OR audits OR auditing OR audited OR budget OR budgets OR budgeting OR budgeted OR rationale OR staff OR staffing OR staffed OR staffs OR personnel OR salary OR salaries OR promote OR promoted OR promotes OR promoting OR promotion OR promotions OR headcount OR "head-count" OR layoff OR layoff* OR "lay-off" OR lay-offs OR leave) w/25 (office OR offices OR practice OR practices OR region OR regions OR regional OR west OR northeast OR midatlantic OR "mid-atlantic" OR midwest OR "mid-west" OR south OR "north america" OR Americas OR restructure OR restructuring OR restructured OR restructures OR reorg OR reorganization OR re-org OR re-organization OR "new vision" OR brand OR brands OR branded OR branding OR network OR team OR teams OR area OR areas OR lead OR leads OR leader OR leaders OR leadership)	519,344
"a plan"	30,023
pmp	7,380
policy OR policies	272,084
(position OR positions) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring)	35,912
green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	14,365
"Power of One"	3,604

(pregnant or pregnancy) w/10 (policy OR policies OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring)	4,747
(pregnant or pregnancy) w/10 (policy OR policies OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring) green OR hubbard OR macLaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannaforde OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	1,196
prejudice OR prejudiced OR prejudicial OR prejudices	2,326
probation OR probationary OR probated	3,526
(promote OR promoted OR promotes OR promoting OR promotion OR promotions) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring OR app OR apply OR applied OR applies OR application OR applications)	54,540

(promote OR promoted OR promotes OR promoting OR promotion OR promotions) w/20 (man OR men OR manager OR managers OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR macLaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR truco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR deJohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mcclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	17,403
"a raise"	2,260
rationale	21,012
(recommend OR recommended OR recommending OR recommends OR recommendation OR recommendations) w/10 (promote OR promotion OR promotions OR promoted OR promotes OR promoting OR terminate OR termination OR terminations OR terminated OR terminates OR terminating OR fire OR fired OR fires OR firing OR hire OR hired OR hires OR hiring OR pay OR paid OR pays OR paying OR increase OR increasing OR increased OR increases OR raise OR raised OR raises OR raising OR decrease OR decreased OR decreases OR decreasing OR demote OR demotion OR demotions OR demoted OR demotes OR demoting OR transfer OR transfers OR transferred OR transferring)	19,635
(recruit OR recruits OR recruited OR recruiting OR recruitment) w/10 (policy OR policies OR lead OR leads OR leader OR leaders OR leadership OR leading OR head OR heads OR heading OR headed OR team OR teams OR north OR america OR americas OR jim OR tsokanos OR md OR mds OR director OR directors OR manage OR manager OR managers OR managed OR manages OR management OR president)	55,472
(redefine OR redined OR redefining OR restructure OR restructured OR restructuring OR move OR moved OR moving OR align OR aligned OR aligning OR alignment) w/15 (lead OR leads OR leader OR leaders OR leadership OR leading OR head OR heads OR heading OR headed OR team OR teams OR north OR america OR americas OR jim OR tsokanos OR region OR regions OR hubs OR west OR Midwest OR northeast OR midatlantic OR south OR md OR mds OR director OR directors OR manage OR manager OR managers OR managed OR manages OR management OR president OR structure)	111,137
(reduce OR reduces OR reduced OR reducing OR reduction OR reductions OR eliminate OR eliminates OR eliminated OR eliminating OR elimination OR eliminations) w/5 (policy OR policies OR force OR work OR work-force OR workforce OR job OR jobs OR position OR positions OR title OR titles OR team OR teams OR practice OR practices OR staff OR headcount OR employee OR employees OR cost OR costs OR saving OR savings)	49,392

OR elimination OR eliminations) w/10 (hall OR hirson OR mcMahon OR pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen	10,534
(region OR regions OR regional OR hub OR hubs) w/10 (lead OR leads OR leader OR leaders OR leadership OR leading OR head OR heads OR heading OR headed OR team OR teams OR north OR america OR americas OR jim OR tsokanos OR md OR mds OR director OR directors OR manage OR manager OR managers OR managed OR manages OR management OR president)	139,253
relocate OR relocates OR relocated OR relocation OR relocations OR relocating	21,533
(remote OR remoting OR remotely) w/15 (work OR working OR log OR logs OR logged OR logging OR connect OR connected OR connects OR connecting OR connections OR access OR accessed OR accesses OR accessing)	10,137
reorg OR reorganization OR re-org OR re-organization	9,325
(resign OR resigns OR resigned OR resigning OR resignation OR resignations) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring)	3,157
OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	2,685
restructure OR restructured OR restructures OR restructuring OR structurings OR structure	85,721

(retain OR retention) w/10 (policy OR policies OR force OR work OR work-force OR workforce OR job OR jobs OR position OR positions OR title OR titles OR team OR teams OR practice OR practices OR staff OR headcount OR employee OR employees)	17,521
rif OR riffed OR rife OR rified OR riffs	2,545
(salary OR salaries) w/10 (policy OR policies OR benchmark OR benchmarks OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises)	27,283
(salary OR salaries) w/20 (hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	10,249
severance	14,531
sex OR sexy OR sexual OR sexiness	36,371
"simpler management"	11
stereotype OR stereotyping OR stereotyped OR stereotypes	2,728
(survey OR suveys OR surveyed OR surveying OR questionnaire OR questionnaires OR interview OR interviews OR comment OR comments OR feedback) w/10 (salary OR salaries OR band OR bands OR bench OR benchmark OR benchmarks OR bench-mark OR bench-marks OR promotion OR promotions OR leadership OR management OR executives OR "glass ceiling" OR women OR females OR pregnancy OR worklife OR "working mothers" OR caregivers OR family OR gender OR sex)	52,224
Swing OR swinging	11,596

(terminate OR terminated OR terminates OR terminating OR termination OR terminations) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring OR cost OR costs OR saving OR savings)	43,402
(terminate OR terminated OR terminates OR terminating OR termination OR terminations) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring OR cost OR costs OR saving OR savings) pierce OR mand OR rubi OR friedman OR mckenna OR meadows OR green OR hubbard OR macLaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR deJohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assoud" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mcClean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR	7,424
(title OR titles) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating OR transfer OR transfers OR transferred OR transferring)	19,973

hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	18,638
"title vii" or "title 7"	1,619
(train OR trained OR trains OR training) w/10 (policy OR policies OR manage OR manages OR manager OR managers OR managed OR management OR managing OR leader OR leaders OR leadership OR lead OR leads OR leading)	60,403
(transfer OR transfers OR transferred OR transferring) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises OR nominate OR nomination OR nominates OR nominated OR nominating OR terminate OR terminates OR termination OR terminated OR terminating)	10,322
mckenna OR meadows OR green OR hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	5,346
uniform	7,609
"Viva la Difference"	1,442

(wage OR wages) w/10 (policy OR policies OR except OR exception OR excepted OR fair OR fairness OR fairly OR unfair OR unfairness OR unfairly OR less OR more OR low OR high OR lot OR lots OR adjust OR adjusted OR adjusting OR adjustment OR increase OR increases OR increased OR increasing OR allocate OR allocation OR allocated OR allocating OR equity OR equitable OR equal OR equality OR freeze OR freezes OR froze OR frozen OR freezing OR decrease OR decreases OR decreased OR decreasing OR reduce OR reduced OR reduction OR reduces OR reducing OR advance OR advancement OR advanced OR advances OR advancing OR bias OR biased OR biases OR merit OR merits OR meritorious OR scale OR scales OR scaled OR raise OR raised OR raising OR raises)	7,066
hubbard OR maclaughlin OR andrzejewski OR johnson OR wellikoff OR wolter OR leish OR pingree OR carlton OR dittenhafer OR lorillo OR moore OR trucco OR lucarelli OR babcock OR arens OR ward OR heapes OR rogers OR davis OR severenko OR surchin OR kronish OR rothchild OR hazard OR tornatore OR bowersox OR billups OR davidson OR "van lent" OR goonan OR dejohn OR previdi OR "van horne" OR knox OR hugley OR glasgow OR dacosta OR "clark assouad" OR under OR mcintyre OR heard OR "del bove" OR renard OR baskin OR beaudoin OR binkowski OR branam OR brennan OR bryant OR carberry OR chamberlin OR curran OR "da silva" OR denker OR dhillon OR farnham OR fite OR fleurot OR freund OR gross OR hass OR hannafor OR harris OR hughes OR kolhagen OR lee OR lilien OR lillien OR lund OR manning OR masini OR mayers OR miller OR morsman OR o'donohue OR odonohue OR orr OR perlman OR shapiro OR tsokanos OR wilkinson OR wilson OR baker OR burgess OR caravetta OR carmer OR donaldson OR dorsey OR egler OR falcetti OR hausler OR marinelli OR mclean OR mclean OR morgan OR nesselrodt OR okane OR o'kane OR rosen OR showalter OR sullivan OR trimble OR vickery OR wadia)	920
(work OR works OR working OR worked) w/5 (home OR house OR apartment OR apt)	37,739
"working capital" w/10 (action OR plan OR component OR improve OR improved OR improvement OR raises OR bonuses OR promotions)	1,562

Total Document Count

1,368,218

Total Document Count With Family Members

1,807,539

Metadata Field	Description
BegBates	Beginning production number
EndBates	Ending production number
BegAttach	Beginning production number for document family
EndAttach	Ending production number for document family
Custodian	Name of the person from whose files the document is being produced
DocType	Type of file (e.g. Email, Attachment, Efile)
FileType	Application used to create the file (e.g. Microsoft Word, Adobe Acrobat)
FileExt	File Extension (e.g. .MSG, .DOC, .XLS)
FileSize	File size of the document in Bytes
UNID	Lotus Notes universal document identifier
EmailType	Indication of type of email item (e.g. Calendar, Contact, Email, Note)
Author	'From' field of an email
Recipient	'To' field of an email
CC	'CC' field of an email
BCC	'BCC' field of an email
Subject	'Subject' field of an email
DateSent	Date the email was sent
TimeSent	Time the email was sent
DateReceived	Date the email was received
TimeReceived	Time the email was received
Redacted	Indication that the document being produced is redacted
MD5Hash	MD5 Hash value of the document
FileName	Filename of attachment or loose Efile
FilePath	Path to the folder where the loose file was maintained
FileTitle	'Title' field embedded in extended properties of attachment or loose Efile
FileAuthor	'Author' field embedded in extended properties of attachment or loose Efile
FileCompany	'Company' field embedded in extended properties of attachment or loose Efile
FileComments	'Comments' field embedded in extended properties of attachment or loose Efile
FileCreationDate	'DateCreated' field embedded in extended properties of attachment or loose Efile
FileDatePrinted	'Last Printed' field embedded in extended properties of attachment or loose Efile
DateCreated	File system Date Created field
DateModified	File system Date Modified field
NativeLinkPath	Path to the native files produced in the delivery
NativeLinkName	Name of native file produced in the delivery
ImageLinkPath	Path to the redacted image files produced in the delivery
ImageLinkName	Name of redacted image file produced in the delivery

TextPath	Path to the text files containing the extracted text produced in the delivery
TextName	Name of text file produced in the delivery

| 4817-3933-3390, v. 1-3479-8606, v. 1